## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

NUANCE COMMUNICATIONS, INC.,

Plaintiff and Counterclaim Defendant,

v.

OMILIA NATURAL LANGUAGE SOLUTIONS, LTD.,

Defendant and Counterclaim Plaintiff.

Case No. 1:19-CV-11438-PBS

## DECLARATION OF DIMITRIS VASSOS IN SUPPORT OF OMILIA'S MOTION TO DISMISS COUNTS IX-XIII OF THE FIRST AMENDED COMPLAINT

- I, Dimitris Vassos, make this declaration based on my personal knowledge of the facts stated.
  - 1. I am CEO and Founder of Omilia Natural Language Solutions, Ltd. ("Omilia").
- 2. I received a letter dated November 26, 2015 letter from Caroline Curtis of Nuance Communications Inc. ("Nuance").
- 3. On December 9, 2015, I emailed Nuance my response to the letter. In that email, I indicated Omilia's payment to Nuance of an outstanding account balance. I also wrote that Omilia was "preparing a detailed and analytical response to the rest of the points that you raised in your letter, which should reach you by next week." Neither I nor Omilia sent such a further response to Nuance's November 26 letter.
  - 4. I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 28, 2020, in Athens

Dimitrios Vassos

## **CERTIFICATE OF SERVICE**

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served on June 29, 2020, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5.4 (c).

/s/ Kevin C. Adam
Kevin C. Adam